

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:)	Case No.: 17-21704-CMB
)	
Kevin G. Mickens)	Chapter 13
Debtor)	
)	Doc. No.:
Kevin G. Mickens)	
Movant)	
)	
v.)	
)	
PNC Bank, National Association and)	
Ronda J. Winnecour, Trustee)	
Respondent)	

DECLARATION

I, Albert G. Reese Jr., Esquire, attorney for the above-referenced Debtor, hereby submit this formal written Declaration that the existing Chapter 13 Plan is sufficient to fund the plan with the modified debt for the following reason:

Pursuant to PNC Bank, National Association's Notice of Mortgage Payment Change dated April 25, 2022, the Debtor's current escrow payment for account number ending in **5606** is **\$454.14**. The new escrow payment is **\$465.76**. The new total mortgage payment is **\$465.76** effective June 1, 2022. The Debtor will make the escrow shortage of **\$11.62** in addition to his regular monthly Chapter 13 plan payment.

Dated: **May 15, 2022**

Respectfully submitted by:

/s/ Kevin G. Mickens

Kevin G. Mickens

Dated: **May 15, 2022**

Respectfully submitted by:

/s/ Albert G. Reese, Jr., Esquire

Albert G. Reese, Jr., Esquire

Attorney for Debtor

PA ID #93813

640 Rodi Road, 2nd Floor, Suite 2

Pittsburgh, PA 15235

(412) 241-1697

(412) 241-1687(fax)

areese8897@aol.com